

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ADENIS ENRIQUE PRIETO	:	
REFUNJOL, et al.,	:	
	:	
Petitioners-Plaintiffs,	:	Case No. 2:20-cv-2099
	:	
v.	:	JUDGE MORRISON
	:	
REBECCA ADDUCCI, et al.,	:	MAGISTRATE JUDGE VASCURA
	:	
Respondents-Defendants.	:	

**DEFENDANT’S MOTION FOR LEAVE TO FILE BRIEF IN OPPOSITION TO  
PETITION FOR WRIT OF HABEAS CORPUS AND COMPLAINT FOR INJUNCTIVE  
RELIEF, AND IN OPPOSITION TO MOTION FOR TEMPORARY RESTRAINING  
ORDER AND OTHER RELIEF UNDER SEAL**

Now comes Defendants, by and through their counsel, the United States Attorney for the Southern District of Ohio, and moves the Court for an order granting leave to the Defendants to file their upcoming Brief under seal, for the reasons set forth in the accompanying Memorandum in Support.

Respectfully submitted,

DAVID M. DEVILLERS  
United States Attorney

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Attorneys for Defendant

## MEMORANDUM IN SUPPORT

Defendant will be filing their brief in opposition to the Petition for Habeas Corpus and Motion for Injunctive relief shortly. The brief will contain multiple references to medical conditions and treatments for each Petitioner. To maintain the confidentiality of these conditions and treatments, Defendants request that the Court grant this request to file their brief under seal.

Based upon the recent amendment filed by Petitioners, it is anticipated that similar references will be made in futures responses filed by Defendants. As such, Defendants request a blanket order covering all future filings as well.

In the event that the Court determines that Defendants' entire brief should not be filed under seal, Defendants request the opportunity to first file its brief under seal, to be followed by the filing within seven days of a redacted copy.

Respectfully submitted,

DAVID M. DEVILLERS  
United States Attorney

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Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing motion was filed using the Court's CM/ECF system on this 6th day of May, 2020, which will provide notice to counsel of record.

s/Mark T. D'Alessandro  
MARK T. D'ALESSANDRO (0019877)